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October 3, 2019

Via Lawyers Service and ECF

Hon. Lois H. Goodman, U.S.M.J.
United States District Court
District of New Jersey
Clarkson S. Fisher Federal Building &
U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

RE: *In Re Effexor XR Antitrust Litigation*
Master Docket No.: 11-5479 (PGS)(LHG)

Dear Judge Goodman:

This firm is co-counsel with Kirkland & Ellis LLP for Defendants Teva Pharmaceutical Industries Ltd. and Teva Pharmaceuticals USA, Inc. ("Teva") in the above-referenced consolidated cases, in which Teva's motion to permanently seal the Special Discovery Master's September 13, 2019 Decision and Order (DE No. 619) is returnable before Your Honor on November 4, 2019.

For the convenience of the Court, enclosed please find copies of the following motion papers filed on behalf of Teva: (1) Notice of Motion to Seal; (2) Declaration of Gavin R. Tisdale (with Exhibit 1) in Support of Motion; (3) a proposed form of Order; and (4) a Certification of Service. Pursuant to Your Honor's procedure with regard motions to seal, I also enclose a copy of the Decision and Order with the confidential information highlighted.

We thank the Court for your consideration of this matter.

TOMPKINS, McGUIRE, WACHENFELD & BARRY

Page 2

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Brian M. English". The signature is fluid and cursive, with a long horizontal stroke at the end.

Brian M. English
FOR TOMPKINS, McGUIRE, WACHENFELD & BARRY

cc: All Counsel (Via ECF, w/o enclosures)